

**REMARKS**

Claims 1-19 are all the claims pending in the application. As shown in the foregoing amendments, claims 14, 6 and 7 are amended and new claims 9-19 are added. In view of at least the foregoing amendments and following remarks, applicant respectfully requests withdrawal of the rejections and allowance of the claims. Additionally, applicant thanks the Examiner for indication of priority, and for indication of the references submitted by application in the previously submitted Information Disclosure Statements.

**I. 35 U.S.C. § 112, 2<sup>nd</sup> paragraph**

Claims 2-8 stand rejected due to alleged indefiniteness under 35 U.S.C. § 112, 2<sup>nd</sup> paragraph. As shown in the foregoing amendments, applicant has amended the claims in a manner that is believed to overcome the Examiner's rejections under 35 U.S.C. § 112, 2<sup>nd</sup> paragraph. For example, applicant has amended amend claim 3 to more clearly recite the directions in which the bead lock means are movable, as well as claims 4 and 6.

Further, applicant notes that the Examiner rejects claim 2 due to the recitation of "shaping" at lines 1-2 instead of "formed" with respect to the cylindrical carcass on the building drum . With respect to this rejection, applicant directs the Examiner to the paragraph bridging pages 12-13 of the application. Applicant respectfully submits that this citation discloses the shaping of the cylindrical carcass band on the building drum, as opposed to separately from the building drum.

Accordingly, applicant respectfully requests withdrawal of the rejections under 35 U.S.C. § 112, 2<sup>nd</sup> paragraph.

**II. 35 U.S.C. § 102**

Claims 1 and 2 stand rejected due to alleged anticipation under 35 U.S.C. § 102(b) by either Kumagai et al (U.S. Patent No. 5,181,982) or Mallory (U.S. Patent No. 3,833,445). For at least the reasons discussed below, applicant respectfully submits that neither of the cited references discloses each and every feature of claims 1 and 2 as amended. Thus, applicant respectfully requests withdrawal of the rejection, and allowance of the claims.

With respect to Kumagai, the Examiner asserts that FIGS. 4a-4c disclose the claimed features, including a carcass band 31, bead cores 32 and bead fillers 33 arranged on a drum, radial deformation of the bead cores by the tire building drum, and turning of the end portions of the carcass around the bead core (FIG. 4(b); see column 5, lines 32-45). The Examiner cites rigid support members 11, upon which the carcass band central portion is pushed while the carcass band is being turned.

With respect to Mallory, the Examiner asserts that FIGS. 12-16 disclose the claimed features, including cylindrical carcass band 7, bead cores 232, bead fillers, and rigid support members 125/271.

Applicant respectfully submits that the Examiner's cited references fail to anticipate claims 1 and 2 under 35 U.S.C. § 102(b) as amended. For example, applicant respectfully submits that neither Kumagai nor Mallory discloses two differently shaped kinds of rigid support members alternately arranged in a peripheral direction without space in at least diameter-expanded posture, as recited in independent claims 1 and 2 as amended.

For at least the foregoing reasons, applicant respectfully requests withdrawal of the rejections under 35 U.S.C. § 102, and allowance of the claims.

**III. 35 U.S.C. § 103**

Claims 1-8 stand rejected due to alleged obviousness under 35 U.S.C. § 103(a) based on the Examiner's proposed combination of Mallory and Missioux (U.S. Patent No. 3,560,302). For at least the reasons explained below, applicant respectfully submits that the Examiner's proposed combination of references fails to disclose or suggest all of the claimed combinations of features, and thus applicant requests withdrawal of the rejections, and allowance of the claims.

The Examiner asserts that Mallory discloses a tire building drum including a cylindrical building bladder 36, bead lock means 70, double fold bladders 184 and rigid support members 80/271. As admitted by the Examiner, Mallory fails to disclose rigid support members aligned in a peripheral direction without space in at least diameter-expanded posture. The Examiner notes spaced apart elements 125 of FIG. 4. The Examiner proposes to combine Missioux and DE '301 with Mallory, and asserts that it would have been obvious to configure the side supports of Mallory of nested supports that are collapsible and permit continuous supports, to thus enable more precise building/turn-up operations. The Examiner also provides further citation for the rejection of dependent claims 4-8.

For at least the reasons discussed above, applicant respectfully submits that the proposed combination of references does not disclose or suggest all of the features recited in claims 1 and 2. For example, but not by way of limitation, applicant respectfully submits that none of the cited prior art, individually or in combination, discloses or suggest two differently shaped kinds of rigid support members alternately arranged in a peripheral direction without space in at least diameter-expanded posture, as recited in claims 1 and 2. As admitted by the Examiner, Mallory has a space between the rigid support members. Further, Missioux and DE '131 also do not

disclose differently shaped kinds of support members. Thus, applicant respectfully requests withdrawal of the rejection of claims 1 and 2.

Turning to independent claim 3, applicant respectfully submits that the Examiner's proposed combination of references fails to disclose or suggest two differently shaped kinds of rigid support members alternately arranged in a peripheral direction and without space therebetween, as required by independent claim 3. As admitted by the Examiner, Mallory has a space between the rigid support members. As noted above, Mallory does not disclose two differently shaped kinds of rigid support members.

Further, applicant respectfully submits that the combination of Mallory with Missioux and/or DE '131 do not cure these deficiencies of Mallory. For example, but not by way of limitation, applicant respectfully submits that because only a single shape of rigid support member arranged in a peripheral direction is disclosed in both Missioux and DE '131. Therefore, applicant respectfully requests withdrawal of the rejection of claim 3.

Applicant respectfully submits that the dependent claims are allowable by virtue of their dependency from the independent claims, which are believe to be allowable as explained above. Thus, applicant respectfully requests withdrawal of the rejections, and allowance of the claims.

#### **IV. New Claims**

As shown in the foregoing amendments, applicant has added new dependent claims 9-20. The new claims recite additional details of the rigid support members 10a, 10b. Applicant respectfully submits that the new claims are allowable at least by virtue of the allowability of the independent claims from which they depend, which are believed to be allowable for at least the reasons discussed above.

**V. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

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